

**REMARKS**

Claims 1-15 are all the claims pending in the application.

***Claim rejections***

Claims 1-8, 14-15 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Kofune et al. (US Patent 5, 483, 069; hereinafter “Kofune”) in view of the allegedly disclosed Prior Art. Applicant traverses the rejections at least for the following reasons.

**Claim 1**

Applicant respectfully submits that the Examiner has failed to meet the basic requirements of a prima facie case of obviousness. “To establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. **Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations.**” (MPEP §2143)

Applicant submits that Kofune, alone or in combination with the alleged disclosed Prior Art, does not disclose all the limitations as recited in claim 1. For instance, claim 1 recites, *inter alia*, “a driver’s license image capturing module for image capturing a watermark of a driver’s license from both obverse and reverse side and an authenticity judging module which judges the driver’s license is a forgery if neither of the watermarks image captured from the obverse nor reverse side by the driver’s license image capturing module is recognized as a regular watermark, and judges the driver’s license is authentic if at least one of watermarks is recognized as a regular watermark.”

The Examiner asserts that FIGS. 6-7 and column 5, line 35-column 6, line 21 of Kofune disclose an image capturing module allegedly including all the limitations of the image capturing module as defined by claim 1. Furthermore, the Examiner contends that column 1, lines 16-22 and column 5, line 35-column 6, line 21 disclose an authenticity judging module with all the features as defined in claim 1. The Examiner relies on the alleged disclosed Prior Art for teaching an authentic checker of a driver's license. Applicants respectfully submit that Kofune, alone or in combination with the alleged disclosed Prior Art does not disclose **each and every feature** of the claimed invention as recited in claim 1, at least for the following reasons.

#### **Image capturing module**

Kofune is directed to an apparatus for validating bank bills by comparing patterns read on each bills with a pattern data of true bills stored in a memory (Abstract). Kofune discloses a reflection light sensor 3 and a transmission light sensor 8 (FIG. 6). The reflection light sensor 3 includes a reflection light emitter 4 and reflection light detector 5 (FIG. 7). The transmission light sensor 8 includes a transmitted light emitter 7 and transmitted light detector 6 (FIG. 7)<sup>1</sup>. The sensors 3 and 8 are arranged in a row and parallel with the conveying direction of the bank bill 1 to read its print patterns of the same position. The reflection light sensor 3 detects **only the print patterns on the surface** and the transmission light sensor **detects a signal including the pattern of the watermark D with the print patterns** (column 5, lines 60-64).

Specifically, Kofune discloses that both the detectors 5, 7 of the sensors 3, 8 are **arranged in a row and parallel with the conveying direction** of the bank bill 1. Applicant

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<sup>1</sup> It is clear from the illustration of FIG. 6 that element 7 emits the light and element 6 detects the light. However, the transmitted light emitter and transmitted light detector appear incorrectly labeled in FIG. 7.

respectfully submits that even though light is emitted underneath the bill 1 by the light emitter 7 and transmitted through the bill, the transmitted detector 6 detects the light on the top surface of the bill 1. Therefore, Kofune discloses that the detectors 5 and 6 capture the image on the same surface; it does not disclose image capturing a watermark from both the obverse and reverse side. Also, Kofune discloses that the reflection light sensor 3 detects only the print patterns on the surface (column 5, lines 60) and does not detect the watermark pattern D. Accordingly, only one sensor (the transmission light sensor 8) is disclosed in Kofune to detect the watermark pattern D. Therefore, the watermark D is only detected from one side (the top) and not both the obverse and reverse side as recited in claim 1.

#### **Authenticity judging module**

Kofune discloses that data on print patterns of the bill are detected and compared with print pattern data of the corresponding true bills sorted in a memory (column 1, lines 16-22). Furthermore, according the disclosure in FIG. 6-8, the bill is validated as a true one if the output data on the portion corresponding to the watermark D from both sensors 3 and 8 do not coincide with each other (column 5, lines 65-67). However, this does not disclose an authenticity judging module which judges the driver's license is a forgery if neither of the watermarks image captured from the obverse nor reverse side by the driver's license image capturing module is recognized as a regular watermark, and judges the driver's license is authentic if at least one of watermarks is recognized as a regular watermark.

In particular, Kofune discloses checking to see if the output data on the portion corresponding to watermark D (center portion on bill 1) from the reflective light sensor 3 and the transmission light sensor 8 coincide. As noted above, the reflective light sensor 3 does not detect

the pattern of the watermark D. Consequently, Kofune would not be understood to disclose that a bill is a forgery if neither of the watermark image captured from the obverse nor reverse side is recognized as a regular watermark.

Furthermore, Kofune merely discloses that the bill 1 is validated by comparing the data detected by the sensors 3 and 8 with each other to see if they coincide. If the data detected by the two sensors coincide the bill is disclosed to be forged (column 6, lines 1-12). However, this does not disclose judging that the bill is a forgery **if both the watermarks** (only one sensor detects watermark in Kofune) **captured from the obverse side and the reverse side** (only one side is disclosed in Kofune) **is not recognized as a regular watermark**.

In view of the above, Applicant submits that Kofune does not disclose all the limitation of the claim 1 as required by section 2143 of the MPEP. Furthermore, the conventional system disclosed in the specification discloses that watermark is obtained by the capturing the data only from the obverse side of the driver's license. Since both Kofune and the conventional system disclosed in the specification, alone or combined, do not disclose all the limitations of claim 1 as recited in the claim, claim 1 is allowable over the cited references.

#### Claims 2, 14 and 15

Applicant submits that claims 2, 14 and 15 recite subject matter analogous to claim 1, and therefore are allowable at least for the similar reasons claim 1 is shown to be allowable.

Furthermore, with regard to claim 14, Applicant submits that the claim, which is directed to a method, clearly recites, *inter alia*, that **"if the watermark on the obverse is determined not regular, gathering second driver's license imaging data based on a watermark on the reverse side of the driver's license"**, and determining if the watermark on the reverse side is

regular based on the second driver's license imaging data, and wherein the gathering of first driver's license imaging data further comprises irradiating the driver's license; wherein, the driver's license is a forgery if the watermarks on the obverse and reverse sides are both deemed not regular, and the driver's license is authentic if either watermark on the obverse and reverse side is deemed regular."

Applicant respectfully submits that the Examiner does not give any weight the portion of the claim that recites **if the watermark on the obverse is determined not regular, gathering second driver's license imaging data based on a watermark on the reverse side of the driver's license.** This unique feature of claim 14 is not disclosed in Kofune nor the conventional system disclosed in the specification. Specifically, Kofune discloses that the sensors 3 and 8 are arranged in row and are in parallel. Both the sensors 3 and 8 detects data and compare to see if the detected data coincide. However, Kofune does not disclose **gathering** a second imaging data based on **a watermark on the reverse side** of the driver's license, **if the watermark on the obverse side is determined not to be regular.**

#### Claims 3-8

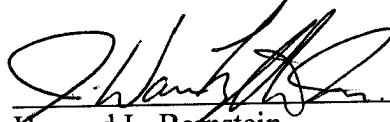
Applicant submits that claims 3-8 depend from claim 1, and therefore are allowable at least by virtue of their dependency.

#### ***Conclusion***

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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